

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**HAYWOOD, et al.,**

**Plaintiffs,**

**v.**

**TEXAS REALATOR, et al.,**

**Defendants.**

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**Civil Action No. 3:22-cv-2174-C-BT**

**REPLY IN SUPPORT OF  
DEFENDANTS PENNYMAC LOAN SERVICES, LLC'S AND  
MACKIE WOLF ZIENTZ & MANN, P.C.'S MOTION TO DISMISS PURSUANT  
TO FEDERAL RULE OF CIVIL PROCEDURE 12(B)(5)**

Defendants PennyMac Loan Services, LLC ("PennyMac") and Mackie Wolf Zientz & Mann PC ("MWZM", collectively "Defendants"), file this *Reply in Support of Motion to Dismiss Pursuant to Federal Rule of Civil Procedure 12(b)(5)* and respectfully show the Court as follows:

**I.**

Plaintiff Tianikwa Haywood ("Plaintiff") in her Objection to Defendants' Motion to Dismiss [ECF No. 13] offers nothing to suggest that she properly served either Defendant. Contrary to Plaintiff's assertions, service of summons and complaint by regular United States mail is not permitted under either the Federal Rules of Civil Procedure or the Texas Rules of Civil Procedure. Further, Plaintiff in her Response says nothing about service on PennyMac.

**WHEREFORE, PREMISES CONSIDERED,** Defendants respectfully request this Court dismiss Plaintiffs' Complaint with prejudice and grant Defendants all other relief to which it may be entitled.

Respectfully submitted,

By: /s/ Mark D. Cronenwett  
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*Attorneys for Defendants Mackie Wolf Zientz &  
Mann, P.C. and PennyMac Loan Services, LLC*

**CERTIFICATE OF SERVICE**

The undersigned further certifies that on November 8, 2022, a true and correct copy of the foregoing document was delivered via regular United States mail to the following counsel of record:

Tianikwa Haywood  
3222 Burgundy Lane  
Midlothian, Texas 76065  
*Pro Se Plaintiff*

/s/ Mark D. Cronenwett  
**MARK D. CRONENWETT**